

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CASE NO. 15-20503

Plaintiff,

HON. GERSHWIN A. DRAIN

v.

VIOLATIONS: 18 U.S.C. §§ 911,  
1001(a), 1028A; 8 U.S.C. § 1325(a)

D-1 ALEXANDER MURRELL,

Defendant.

2015 OCT -8 P 3:38  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
DETROIT DIVISION  
FILED  
MURRELL, ALEXANDER  
D-1  
3:38

**FIRST SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES

**COUNT ONE**

(False Claim of United States Citizenship -- 18 U.S.C. § 911)

D-1 ALEXANDER MURRELL

On or about July 5, 2015, in the Eastern District of Michigan, Southern Division, defendant, ALEXANDER MURRELL, did knowingly, willfully, and falsely represent himself to be a citizen of the United States, in violation of Title 18, United States Code, Section 911.

**COUNT TWO**

(False Statement – 18 U.S.C. § 1001(a))

On or about July 5, 2015, in the Eastern District of Michigan, Southern Division, defendant, ALEXANDER MURRELL, in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the Department of Homeland Security, knowingly and willfully made a materially false, fictitious and fraudulent statement and representation to an officer and agent of the United States Custom and Border Patrol, namely that the defendant, ALEXANDER MURRELL, stated that he was as a citizen of the United States, all in violation of Title 18, United States Code, Section 1001(a).

**COUNT THREE**

(Improper Entry By Alien – 8 U.S.C. § 1325(a))

On or about July 5, 2015, in the Eastern District of Michigan, Southern Division, defendant, ALEXANDER MURRELL, an alien, did knowingly enter and attempt to enter the United States at a place other than as designated by immigration officers, in violation of Title 8, United States Code, Section 1325(a).

**COUNT FOUR**

(Aggravated Identity Theft – 18 U.S.C. § 1028A)

On or about July 5, 2015, in the Eastern District of Michigan, South Division, defendant, ALEXANDER MURRELL, during and in relation to a felony violation, namely, false claim of United States citizenship, in violation of Title 18, United States Code, Section 911, as charged in Count 1, and false statements, in violation of Title 18, United States Code, Section 1001, as charged in Count 2, did knowingly possess and use, without lawful authority, a means of identification of another person, specifically the full name and date of birth of a member of the United States

Army who had been killed in action, all of which is a violation of Title 18, United States Code, Section 1028A.

THIS IS A TRUE BILL

s/GRAND JURY FOREPERSON

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Foreperson

BARBARA MCQUADE  
United States Attorney

s/ Jonathan Tukel  
Jonathan Tukel  
Assistant United States Attorney  
Chief, National Security Unit

s/ Michael C. Martin  
Michael C. Martin  
Assistant United States Attorney

Dated: October 8, 2015

|  |                                  |                         |
|--|----------------------------------|-------------------------|
| United States District Court<br>Eastern District of Michigan | <b>Criminal Case Cover Sheet</b> | Case Number<br>15-20503 |
|--|----------------------------------|-------------------------|

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

|  |                             |                             |
|--|-----------------------------|-----------------------------|
| <b>Companion Case Information</b>  |                             | Companion Case Number:      |
| This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> : |                             | Judge Assigned:             |
| <input type="checkbox"/> Yes   | <input type="checkbox"/> No | AUSA's Initials: <b>MCM</b> |

**Case Title:** USA v. ALEXANDER MURRELL

**County where offense occurred :** Wayne

**Check One:**  **Felony**  **Misdemeanor**  **Petty**

Indictment/ Information --- no prior complaint.  
Indictment/ Information --- based upon prior complaint [Case number: ]  
Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### **Superseding Case Information**

**Superseding to Case No:** 15-20503 **Judge:** Gershwin A. Drain

Original case was terminated; no additional charges or defendants.  
 Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below:

| <b>Defendant name</b> | <b>Charges</b>    | <b>Prior Complaint (if applicable)</b> |
|-----------------------|-------------------|--|
| Alexander Murrell     | 18 U.S.C. § 1028A | 15-mj-30328                            |

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

October 8, 2015  
Date



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Attorney Bar #:

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.